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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

ROBERT CRAGO, Individually And On Behalf  
Of All Others Similarly Situated,

Plaintiff,

v.

CHARLES SCHWAB & CO., INC., and THE  
CHARLES SCHWAB CORPORATION,

Defendants.

Case No. 3:16-cv-3938-RS

**CLASS ACTION**

**JOINT STIPULATION AND ORDER FOR  
EXTENSION OF CLASS  
CERTIFICATION SCHEDULE  
AS MODIFIED BY THE COURT**

1 Pursuant to Local Rule 6-2, Lead Plaintiffs Robert Wolfson and Frank Pino and named  
2 plaintiff Scott Posson (“Plaintiffs”), and Defendants Charles Schwab & Co., Inc. and The Charles  
3 Schwab Corporation (“Defendants” or “Schwab” and, together with Plaintiffs, the “Parties”), by and  
4 through their respective counsel, for good cause, hereby stipulate as follows:

5 WHEREAS, on April 15, 2019, the Court entered a Case Management Scheduling Order  
6 setting the case schedule through the class certification hearing (ECF No. 144), and on April 6, 2020  
7 the Court so-ordered the Parties’ stipulation to extend the case schedule (ECF No. 150);

8 WHEREAS, the Parties have engaged in class certification and merits discovery and are  
9 continuing to meet and confer in good faith regarding outstanding issues;

10 WHEREAS, on February 5, 2020, Plaintiffs noticed a Rule 30(b)(6) deposition that was  
11 originally scheduled for May 7, 2020;

12 WHEREAS, on June 1, 2020, the Parties met and conferred regarding the case schedule in  
13 light of certain restrictions due to COVID-19 and in response to the Court’s May 18, 2020 Order  
14 (ECF No. 151);

15 WHEREAS, the Parties have agreed to re-schedule the Rule 30(b)(6) deposition for July 29,  
16 2020 to potentially allow for an in person deposition;

17 WHEREAS, the current deadline for pre-class certification fact depositions is June 12, 2020,  
18 so the Parties need an extension of the current class certification deadlines to accommodate the date  
19 of this deposition;

20 WHEREAS, the Parties have agreed, with the Court’s approval, to modify the Case  
21 Management Scheduling Order to extend the deadlines by approximately one month for each deadlne  
22 through the class certification hearing;

23 WHEREAS, this is the Parties’ fifth request for an extension of the deadlines in the Case  
24 Management Scheduling Order;

25 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO  
26 APPROVAL BY THIS COURT, as follows:

27 The deadlines through the class certification hearing shall be as follows:  
28

Event	Deadline
Pre-class certification fact depositions	July 31, 2020
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	September 1, 2020
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	November 6, 2020
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	December 23, 2020
Expert depositions concerning class certification	January 6-20, 2021
Plaintiffs' class certification motion and <i>Daubert</i> challenges	February 15, 2021
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	April 16, 2021
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	May 5, 2021
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	May 31, 2021
Class Certification Hearing	June 17, 2021
Date for Parties to Seek to Engage in Private Mediation	September 4, 2020

IT IS SO STIPULATED.

Dated: June 22, 2020

**GLANCY PRONGAY & MURRAY LLP**

By: /s/ Jonathan Rotter

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1 Dated: June 22, 2020

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11 *Attorneys for Defendants*

12  
13 **ATTESTATION**

14 I, Jonathan Rotter, am the ECF User whose identification and password are being used to file  
15 this Proposed Order for Extension of Class Certification Schedule. In compliance with Local Rule  
16 5-1(i)(3), I hereby attest that Counsel for Defendants concur in this filing.  
17

18  
19 DATED: June 22, 2020

\_\_\_\_\_  
*Jonathan Rotter*  
Jonathan Rotter

**ORDER**

Based on the Parties' stipulation and the good cause described therein, the Court GRANTS this stipulation. The following schedule shall apply:

<b>Event</b>	<b>Deadline</b>
Pre-class certification fact depositions	July 31, 2020
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	September 1, 2020
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	November 6, 2020
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Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	May 31, 2021
Class Certification Hearing	June 17, 2021
Date for Parties to Seek to Engage in Private Mediation	September 4, 2020

IT IS SO ORDERED.

DATED: 6/23/2020



Hon. Richard Seeborg  
U.S. District Court Judge